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15 16 17	Attorneys for Defendants Lyft, Inc., Logan Green, John Zimmer, Brian Roberts, Prashant (Sean) Aggarwal, Ben Horowitz, Valerie Jarrett,			
18	Additional Counsel on Signature Page			
19	UNITED STATES DISTRICT COURT			
20	NORTHERN DISTRICT OF CALIFORNIA			
21	OAKLAND DIVISION			
22	In re LYFT INC. SECURITIES LITIGATION	MASTER FILE NO. 4:19-CV-02690-HSG		
23	This Document Relates to:	JOINT STIPULATION AND ORDER TO EXTEND BRIEFING		
24	ALL ACTIONS	SCHEDULE ON PLAINTIFF'S MOTION TO COMPEL		
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1	Pursuant to Local Rules 6-2 and 7-12, Defendants Lyft, Inc., Logan Green, John Zimmer,
2	Brian Roberts, Prashant (Sean) Aggarwal, Jonathan Christodoro, Ben Horowitz, Valerie Jarrett,
3	David Lawee, Hiroshi Mikitani, Ann Miura-Ko, and Mary Agnes Wilderotter (the "Lyft
4	Defendants") and Lead Plaintiff Rick Keiner (the "Plaintiff," and together with the Lyft
5	Defendants, the "Parties"), through their counsel, submit the following Joint Stipulation and
6	[Proposed] Order To Extend Briefing Schedule on Plaintiff's Motion to Compel (ECF No. 131).
7	WHEREAS, on February 17, 2021, Plaintiff filed a Motion to Compel (the "Motion" or
8	"Motion to Compel") (ECF No. 131);
9	WHEREAS, the Lyft Defendants' Opposition to the Motion (the "Opposition") is due to
10	be filed on March 3, 2021, and Plaintiff's Reply in support of the Motion (the "Reply") is due to
11	be filed on March 10, 2021;
12	WHEREAS, the hearing on the Motion is scheduled for May 13, 2021;
13	WHEREAS, the Parties have met and conferred and agree to extend the date for the filing
14	of the Opposition from March 3, 2021 to March 17, 2021 and the date for the filing of Plaintiff's
15	Reply from March 10, 2021, to March 31, 2021;
16	WHEREAS, there will still be ample time for the Court to consider the Opposition and
17	Reply prior to the hearing on the Motion, and this extension of time will not alter the date of any
18	event or deadline already fixed by Court order;
19	NOW, THEREFORE, pursuant to Civil Local Rule 6-2, the Parties hereby stipulate,
20	subject to Court approval, that the briefing schedule for the Motion to Compel will be modified as
21	follows:
22	1. The Lyft Defendants shall file their Opposition to the Motion to Compel by March
23	17, 2021; and
24	2. Plaintiff shall file a Reply in support of his Motion to Compel by March 31, 2021.
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1	Stipulated and agreed to by:	
2	Dated: March 1, 2021	
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4		
5	BLOCK & LEVITON LLP	LATHAM & WATKINS LLP
6	/s/ Jeffrey C. Block Jeffrey C. Block (admitted pro hac vice)	/s/ Colleen C. Smith Colleen C. Smith (CA Bar. No. 231216)
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	wstreet@blockleviton.com	Andrew B. Clubok (pro hac vice)
1516	Lead Counsel and Counsel for Plaintiff	Susan E. Engel (<i>pro hac vice</i>) 555 Eleventh Street, NW, Suite 1000 Washington, D.C. 20004
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18		Counsel for Defendants Lyft, Inc., Logan
19		Green, John Zimmer, Brian Roberts, Prashant Aggarwal, Jonathan
20		Christodoro, Ben Horowitz, Valerie Jarrett, David Lawee, Hiroshi Mikitani,
21		Ann Miura-Ko, and Mary Agnes Wilderotter
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1	FILER'S ATTESTATION		
2	Pursuant to Civil L. R. 5-1(i)(3), regarding signatures, I hereby attest that concurrence in		
3	the filing of the document has been obtained from all of the signatories above.		
4	Dated: March 1, 2021 /s/_Colleen C. Smith_		
5	Dated: March 1, 2021 /s/ Colleen C. Smith Colleen C. Smith		
6	* * *		
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8	PURSUANT TO STIPULATION, IT IS SO ORDERED.		
9	α α α α α α α α α		
10	Date: 3/2/2021 HONORABLE HAYWOOD S. GILLIAM, JR.		
11	U.S. DISTRICT JUDGE		
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